



Louis M. Solomon

Direct Phone: +1 212 549 0400

Email: Lsolomon@reedsmith.com

Reed Smith LLP
599 Lexington Avenue
New York, NY 10022-7650
Tel +1 212 521 5400
Fax +1 212 521 5450
reedsmith.com

May 27, 2020

Honorable John F. Keenan
United States District Court
Southern District of New York
500 Pearl Street, Room 1930
New York, New York 10007-1312

BSG Resources (Guinea) Limited, BSG Resources (Guinea) Sàrl, and
BSG Resources Limited (in administration) v. Soros, et al.,
Civil Action No. 1:17-cv-02726

Dear Judge Keenan:

We are counsel to Plaintiffs in the above-referenced action. We respectfully write to request an adjournment of the conference in this matter, currently scheduled for June 16, 2020, to a date in late July, preferably July 28, 2020 at the Court's convenience. The sole basis for this request are issues created by the Covid-19 pandemic. Defendants consent to this request. The parties are submitting a stipulation to that effect with this letter.

The conference has been adjourned previously four times (*see* Dkt. 154, 156, 158, 160). The earlier requests were made as Plaintiffs believed that those adjournments would have provided time for enough of a resolution of related proceedings involving Plaintiff BSG Resources Limited as explained in our letters of November 25, 2019 and March 5, 2020.

The sole basis for the current request is the extraordinary financial and management dislocation problems related to our clients caused by the Covid-19 pandemic, principally in Europe. These issues have made it impossible for our clients to provide the requisite direction related to the upcoming hearing. We do not make this request lightly. We are cognizant of the Court's March 10 order that "[u]nless case is resolved this is the final adjournment without counsel appearing in person". However, we respectfully submit that the Covid-19 pandemic has created unanticipated extraordinary global issues that affect our clients in a manner that warrant this minor delay. Of course we are prepared to appear on June 16, should the Court prefer. We will not have substantive instructions by then, however. We are assured that we will have those instructions in advance of the requested adjournment of July 28.

On behalf of all parties, we thank Your Honor for your consideration of this matter.

Hon. John F. Keenan
May 27, 2020
Page 2

Respectfully,

A handwritten signature in blue ink, appearing to read "Louis M. Solomon". The signature is fluid and cursive, with the first name "Louis" and last name "Solomon" clearly distinguishable.

Louis M. Solomon
cc: Counsel of Record (via ECF)